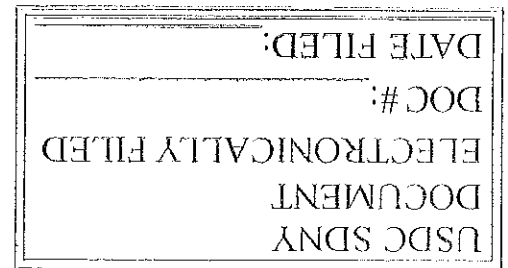




ZACHARY W. CARTER
Corporation Counsel

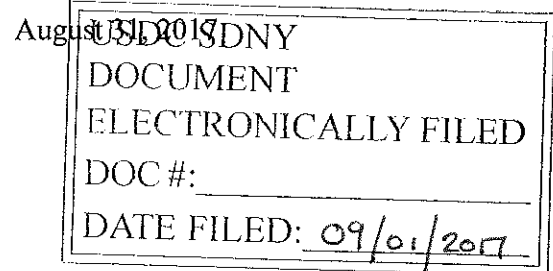
THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JOSEPH ANCI
Senior Counsel
Labor & Employment Law Division
Phone: (212) 356-1106
Fax: (212) 356-2439
E-mail: janci@law.nyc.gov



By ECF

Honorable Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007



Re: Bloomberg v. The New York City Department of Education and Carmen Farina
17-CV-3136 (PGG)

Dear Judge Gardephe:

I am a Senior Counsel in the Labor and Employment Law Division of the New York City Law Department assigned to represent the defendants in the above-referenced action.

Defendants write to request an extension of time to file their motion to dismiss from Friday, September 1, 2017 to Friday, September 8, 2017. This is defendants' first request for an extension of time to file their motion to dismiss. Plaintiff's counsel, Maria Chickedantz, Esq., consents to this request.

Defendants respectfully submit that this extension is necessary for the following reasons: on August 28, 2017 DOE's Office of Special Investigations issued a report concerning the allegations against plaintiff, and, a Technical Assistance Conference between plaintiff and DOE was held on the morning of August 31, 2017. Defendants respectfully submit that more time is required for to review this report, to evaluate the matters discussed during the August 31, 2017 conference, and to determine if either the report of the conference will substantially alter the arguments to be set forth in defendants' proposed motion to dismiss.

To reflect this one week extension of time, the parties respectfully request that the Court so Order the following proposed amended briefing schedule:

- Defendants' motion to be filed on September 8, 2017
- Plaintiff's opposition and cross-motion to be filed on October 9, 2017
- Defendants' reply, if any, to be filed on October 23, 2017

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Sept. 1, 2017

For the foregoing reasons, it is respectfully requested that the Court extend defendants time to file their motion to dismiss to September 8, 2017.

Thank You for Your consideration herein.

Respectfully submitted,

_____/s/
Joseph Anci
Senior Counsel

cc: Maria Chickedantz, Esq. (By ECF)